

REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following remarks is respectfully requested.

Claims 1-22 are presently active in this application. Claims 1, 4, 12 and 18 having been amended and Claims 21-24 added by the present amendment.

In the outstanding Office Action Claims 1-20 were rejected under 35 USC §102(b) as being anticipated by “Stable and Efficient Reduction of Substrates Model Networks Using Congruence Transforms”, K. Kerns et al., ICCAD95\_0207 (hereinafter called “Kerns”).

In light of the outstanding ground for rejection, the independent Claims 1, 4, 12 and 18 have been amended to clarify a feature of the present invention believed to be more clearly patentably distinguishing over the applied prior art. To that end, consistent with the disclosure at page 19, lines 1-4 of the specification, Claim 1, for example, has been amended to clarify the functionality of the recited “matrix reduction module” as “configured to reduce the Y-matrix by eliminating the internal nodes by repeatedly calculating relationships between four elements of the Y-matrix, associated with internal nodes to be eliminated, without calculating inverse matrix of the Y-matrix.” Similar changes have been made to Claims 4, 12 and 18. Also submitted herewith are new Claims 21-24 directed to Equation 19 and the related discussion at page 19 of Applicants’ specification. No new matter has been added.

Kerns discloses a technique for reduction of substrate model networks using congruence transforms, but fails to teach or obviate the claimed matrix reduction module configured to reduce the Y-matrix by eliminating the internal nodes by repeatedly calculating relationships between four elements of the Y-matrix, associated with internal nodes to be eliminated, without calculating an inverse matrix of the Y-matrix. Similarly, Kerns fail to show claimed reducing the Y-matrix by eliminating the internal nodes by repeatedly

calculating relationships between four elements of the Y-matrix, associated with internal nodes to be eliminated, without calculating inverse matrix of the Y-matrix.

On the contrary, according to Kerns, an inverse matrix of the Y-matrix is calculated as shown in Eqs. (7)-(11). In view of this deficiency, it is respectfully submitted that Kerns, clearly does not anticipate or obviate the invention recited in Claims 1, 4, 12 and 18, or in the dependent claims dependent therefrom. Accordingly, it is respectfully submitted that the outstanding rejection has been overcome and withdrawal thereof is respectfully requested.

Consequently, in view of the present amendment and in light of the above comments, no further issues are believed to be outstanding, and the present application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

Customer Number  
**22850**

Tel: (703) 413-3000  
Fax: (703) 413 -2220  
(OSMMN 06/04)

EHK\la

OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, P.C.



Eckhard H. Kuesters  
Attorney of Record  
Registration No. 28,870